

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

**February 2, 2025**

Nathan Ochsner, Clerk of Court

United States of America

v.

Salomon Torres Ventura

Case No.

4:25-MJ-0048

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 1st, 2025 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

8 U.S.C. § 1326 (a) and (b)(2)

*Offense Description*

a native and citizen of Mexico, and an alien who had been previously deported from the United States, subsequent to having been convicted of a crime defined as an Aggravated felony, was found unlawfully in the United States at Houston, Texas, the said defendant having not obtained the consent before March 2003 from the Attorney General of the United States to reapply for admission into the United States; and without having obtained corresponding consent after February 2003 from the Secretary of Homeland Security pursuant to 6 U.S.C. §§ 202(3) and (4) and 6 U.S.C. § 557,

This criminal complaint is based on these facts:

See Attached Affidavit in support of the Criminal Complaint

☒ Continued on the attached sheet.*Complainant's signature*

Daniel I. Chagoya, ICE Deportation Officer

*Printed name and title*

Sworn to me telephonically.

Date: 02/02/2025*Judge's signature*City and state: Houston, Texas

Christina A. Bryan United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Daniel I, Chagoya, being duly sworn telephonically, hereby depose and say:

(1) I am a Deportation Officer with the United States Immigration and Customs Enforcement (“ICE”) and have served in that capacity since November 9, 2008. My law enforcement career began September 18, 2005, as a Customs and Border Protection Officer. I held this position until transferring to Immigration and Customs Enforcement as a Deportation Officer. I currently have over 18 years of immigration law enforcement experience.

(2) On February 1st, 2025, at 1:00 p.m. Salomon Torres Ventura (“Defendant”) was detained by ICE.

(3) The Defendant’s fingerprints have been taken and electronically submitted to various law enforcement databases. According to the Integrated Automated Fingerprint Identification System (IAFIS), the Defendant is the same individual as the person referred to in this Affidavit as having been previously deported and convicted.

(4) Based upon the information from ICE’s records as described below, and my training and experience, I submit that there is probable cause to believe that the Defendant is in violation of 8 U.S.C. § 1326(a) and (b)(2).

(5) Element One: The Defendant is a citizen and national of Mexico and not a native, citizen or national of the United States.

(6) Element Two: The Defendant has previously been deported or removed from the United States on the following occasions:

1. Removed 04/22/2011
2. Removed 02/28/1995

(7) Element Three: After deportation, the Defendant was subsequently found in the United States on February 1st, 2025, at Pasadena, TX, which is within the Southern District of Texas. Specifically, the Defendant was found in Harris County, which is in within the Houston Division of the Southern District of Texas.

(8) Element Four: The Defendant did not have permission to reenter the United States. On February 1st, 2025, I reviewed the contents of the Alien File associated with this Defendant and/or available database information. I found no indication that the Defendant has ever received permission from the Attorney General of the United States, or the Secretary of the Department of Homeland Security, to apply for admission to the United States following deportation from the United States. I have requested certification of this fact from the Records Branch of the Immigration Service.

(9) Prior Criminal History. The Defendant has the following prior criminal history:

- a. On June 5th, 2007, the Defendant was convicted in the United States District Court Southern District of Texas for the offense of possession with intent to distribute a quantity more than 100 kilograms that is, approximately 186 kilograms (409.20 pounds) of marihuana and sentenced to 60 months in prison.
- b. On August 5<sup>th</sup>, 1993, the Defendant was convicted in the United States District Court in Jacksonville, FL for the offense of conspiracy to distribute marijuana and sentenced to 27 months in prison.

(10) On February 2<sup>nd</sup>, 2025, I contacted the U.S. Attorney's Office, Southern District of Texas, Houston Division, concerning this criminal complaint. On or about that day, Assistant U.S. Attorney Charmaine, Holder 713-819-6407 accepted this case for prosecution for a violation of 8 U.S.C. § 1326(a) and (b)(2).



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Daniel I. Chagoya, Deportation Officer  
United States Department of Homeland Security  
U.S. Immigration & Customs Enforcement

Sworn to me telephonically on this 2<sup>nd</sup> day of February 2025, and I find probable cause.

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Hon. Christina A. Bryan  
United States Magistrate Judge  
Southern District of Texas